

WV-120

Response to Petition for Workplace Violence Restraining Orders

Use this form to respond to the *Petition* (form WV-100)

- Read *How Can I Respond to a Petition for Workplace Violence Restraining Orders?* (form WV-120-INFO) to protect your rights.
- Fill out this form and take it to the court clerk.
- Have someone age 18 or older—not you—serve the petitioner or the petitioner's lawyer by mail with a copy of this form and any attached pages. (*Use form WV-250, Proof of Service of Response by Mail.*)

1 Petitioner (Employer)

Name: Tesla, Inc.

2 Employee Seeking Protection

Full Name: Matt Cross

3 Respondent (Person From Whom Protection Is Sought)

a. Your Name: Randeep Hothi

Your Lawyer (*if you have one for this case*)

Name: D. Gill Sperlein State Bar No.: 172887

Firm Name: Law Office of D. Gill Sperlein

b. Your Address (*You may give a mailing address if you want to keep your street address private; skip this if you have a lawyer.*)

Address: 345 Grove Street

City: San Francisco State: CA Zip: 94102

Telephone: 415-404-6615 X103 Fax: _____

E-Mail Address: gill@sperleinlaw.com

4 Personal Conduct Orders

a. I agree to the orders requested.

b. I do not agree to the orders requested.

(Specify why you disagree in item (11) on page 3.)

c. I agree to the following orders (*specify below or in item (11) on page 3*):

5 Stay-Away Orders

a. I agree to the orders requested.

b. I do not agree to the orders requested. *(Specify why you disagree in item (11) on page 3.)*

c. I agree to the following orders (*specify below or in item (11) on page 3*):

Clerk stamps date here when form is filed.

FILED
ALAMEDA COUNTY

MAY 17 2019

CLERK OF THE SUPERIOR COURT
[Signature]
By _____ Deputy

Fill in court name and street address:

Superior Court of California, County of
Alameda
Hayward Hall of Justice
24405 Amador Street
Hayward, CA 94544

Fill in case number:

Case Number:
RG19015770

The court will consider your response at the hearing. Write your hearing date, time, and place from form WV-109, item (4) here:

Hearing Date → Date: 5/21/2019 Time: 1:30
Dept.: 511 Room: _____

If you were served with a Temporary Restraining Order, you must obey it until the hearing. At the hearing, the court may make orders against you that last for up to three years.

6 **Additional Protected Persons**

- a. I agree that the persons listed in item **4** of the Petition may be protected by the order requested.
- b. I do not agree that the persons listed in item **4** of the Petition may be protected by the order requested.

7 Firearms Prohibition and Relinquishment

If you were served with form WV-110, *Temporary Restraining Order*, you cannot own or possess any guns, other firearms, or ammunition. You must sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms in your immediate possession or control within 24 hours of being served with form WV-110. (See item **8** of form WV-110.) You must file a receipt with the court. You may use form WV-800, *Proof of Firearms Turned In, Sold, or Stored* for the receipt.

- a. I do not own or control any guns or other firearms.
- b. I ask for an exemption from the firearms prohibition under Code of Civil Procedure section 527.9(f), because carrying a firearm is a condition of my employment, and my employer is unable to reassign me to another position where a firearm is unnecessary. (*Explain*):
 Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 7b—Firearms Surrender Exemption" as a title. You may use form MC-025, Attachment.

- c. I have turned in my guns and firearms to the police or sold them to or stored them with a licensed gun dealer. A copy of the receipt is attached. has already been filed with the court.

8 **Other Orders**

- a. I agree to the orders requested.
- b. I do not agree to the orders requested. (*Specify why you disagree in item **11** on page 3.*)
- c. I agree to the following orders (*specify below or in item **11** on page 3*):

9 **Denial**

I did not do anything described in item **8** of form SV-100. (*Skip to **11**.*)

10 Justification or Excuse

If I did some or all of the things that the petitioner has accused me of, my actions were justified or excused for the following reasons (*explain*):

Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 10—Justification or Excuse" as a title. You may use form MC-025. Attachment.

11 Reasons I Do Not Agree to the Orders Requested

Explain your answers to each order requested that you do not agree with.

Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 11—Reasons I Disagree" as a title. You may use form MC-025, Attachment.



(12) **No Fee for Filing**

- a. I ask the court to waive the filing fee because the petitioner claims in form WV-100 item (14) to be entitled to free filing.
- b. I request that I not be required to pay the filing fee because I am eligible for a fee waiver. (Form FW-001, Request to Waive Court Fees, must be filed separately.)

(13) **Costs**

- a. I ask the court to order the petitioner to pay my court costs. The amounts requested are:

Item	Amount	Item	Amount
Will Submit w/ Fee Motion	\$ _____		\$ _____
	\$ _____		\$ _____
	\$ _____		\$ _____

Check here if there are more items. Put the items and amounts on the attached sheet of paper and write "Attachment 13—Costs" for a title. You may use form MC-025, Attachment.

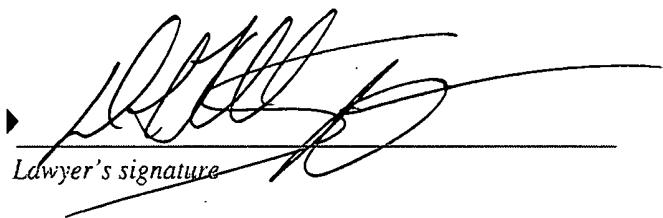
- b. I ask the court to deny the request of the person asking for protection that I pay his or her lawyer's fees and costs.

(14) Number of pages attached to this form, if any: 29

Date: 5/17/2019

D. Gill Sperlein

Lawyer's name (if any)



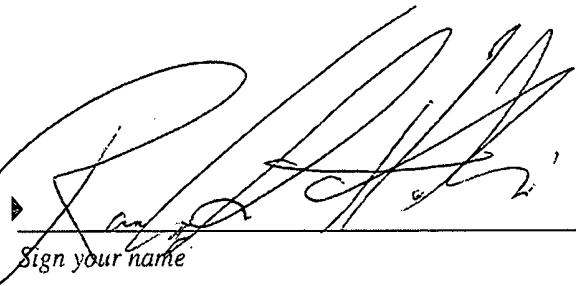
► Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: 5/17/2019

Randeep Hothi

Type or print your name



► Sign your name

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Attorneys for Respondent

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

Tesla, Inc.,
Petitioner,
v.
Randee Hothi,
Respondent.

) **ATTACHMENT 11 – REASONS I
DISAGREE**

) **RESPONSE TO PETITION FOR
WORKPLACE VIOLENCE RESTRAINING
ORDERS**

)
)
)
)
) Scheduled Hearing

) Date: 5/21/2019
) Time: 1:30 pm
) Courtroom: 511

1. Introduction

Randeep Hothi is a citizen journalist whose research and data have revealed discrepancies in claims Tesla and its CEO have made about the company's manufacturing operations, its technological capabilities, its financial health, and its treatment of employees and customers. (See, Declaration of Randeep Hothi in Support of Response to Petition for Workplace Violence Restraining Order (Hothi

1 Decl.) at ¶2). His work has been cited by a number of business and technology
2 reporters and has been relied upon by financial analysts. (Id.). His research has
3 informed public discussion about technology in Silicon Valley and has won for him a
4 wide public following. (Id.). At the time of the events in question, Randeep was
5 critically researching Tesla's extravagant claims about "Full Self-Driving" and a "robo
6 taxi" fleet. (Id.).

7 Relying upon hyperbolic and incendiary language, Tesla has painted a lurid
8 picture of Randeep as a dangerous individual guilty of stalking, harassment, and
9 trespass, whose activities constitute "actual and threatened violence." None of
10 these things is true. In fact, Randeep is a diligent academic researcher who has a
11 history of addressing powerful entities, including corporations, and asking critical
12 questions.

13 Tesla has a history of using the legal system to silence its critics. For example,
14 when Tesla whistleblower Martin Tripp informed media and regulators about battery
15 defects at Tesla's Nevada factory, Tesla CEO Musk set out to destroy him. Tesla
16 made false claims to the local police that an anonymous caller had contacted the
17 company to say Tripp was planning a mass shooting at Tesla's Gigafactory. (See,
18 Matt Robinson and Zeke Faux, "When Elon Musk Tried to Destroy a Tesla
19 Whistleblower," Bloomberg Businessweek (on line Mar. 13, 2019, and attached to
20 Respondent's Request for Continuance as Exhibit G)). In connection with the
21 outrageously false claims made by Tesla against Tripp, Musk also falsely accused
22 reporter Linette Lopez of bribing Tripp for the information. (Id. at Exhibit H). When
23 Tesla Regional Manager Adam Williams reported to his superiors that employees
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1 were knowingly selling defective cars, Tesla demoted and then fired him. (See, Sean
2 O'Kane, "Tesla accused of knowingly selling defective vehicles in new lawsuit," *The*
3 *Verge* (on line Feb. 21, 2018, and attached to Respondent's Request for
4 Continuance as Exhibit I).

5 Following this pattern, Tesla's response to Randeep's criticism is to use the
6 power of this Court not only to silence him, but also to intimidate anyone who
7 attempts to criticize Tesla in the marketplace of ideas. Tesla's attempt to shoehorn
8 the facts here into a workplace violence restraining proceeding is disingenuous but
9 unsurprising given Tesla's rich history of retaliation against critics. (See, Respondent's
10 Request to Continue Hearing, Attachment 3(b)(4) Exhibits A through J.).

11
12 To be sure, Randeep is a widely known critic of Tesla and its CEO, Elon Musk,
13 but he endangered no one, threatened no one, and harassed no one.

14
15 **2. Legal Standard**

16 To issue a restraining order against Respondent, the Court must find by clear
17 and convincing evidence that the employees upon whose behalf Tesla seeks the
18 order suffered unlawful violence or a credible threat of violence. Cal. Code Civ. Pro.
19 §527.8(a). "[I]n determining whether to issue an order [prohibiting harassment], the
20 court should consider the general principles that... [a] prior restraint is a disfavored
21 remedy and [a] court should issue a mandatory injunction only on a clear showing
22 that injury will result if the injunction is not issued. (*California Judge's Benchguide* 20,
23 §20.23, citing, *Hurvitz v. Hoefflin* (2000) 84 CA4th 1232, 1241–1242 and *Youngblood v.*
24 *Wilcox* (1989) 207 CA3d 1368, 1372 n1, respectively).

25
26 "To obtain a permanent injunction under section 527.8, subdivision (f), a
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1 plaintiff must also establish great or irreparable harm would result to an employee
2 without issuance of the prohibitory injunction because of the reasonable probability
3 the wrongful acts will be repeated in the future." (*Scripps Health v. Marin* (1999) 72
4 Cal.App.4th 324, 331 [85 Cal.Rptr.2d 86].).

5 **3. Petitioner Misstates Critical Facts.**

6 Several inaccuracies stand out among the many peppered throughout the
7 Petition. For example, Petitioner claims that the Tesla parking lots are not open to
8 the public. This is not true. Tesla invites the public to its factory showroom which
9 resides in the center of the facility. (Hothi Decl. at ¶3). It is impossible to visit the
10 showroom without passing through multiple parking lots.

11 Tesla states that Randeep has a history of trespassing at Tesla's facilities,
12 unlawfully taking photographs and video to post to his twitter account, and other
13 misconduct. That is false. Randeep has not trespassed on Tesla property. "California
14 Penal Code section 602(n) defines refusal to leave property occupied by another as
15 a form of trespass. The statute 'envisions an originally innocent entry, followed by an
16 unlawful sojourn after refusal of requests to leave.'" (*James v. City of Long Beach*
17 (C.D.Cal. 1998) 18 F.Supp.2d 1078, 1084, citing, *People v. Medrano* (1978) 78
18 Cal.App.3d 198). Tesla invites the public on to its campus and Randeep had not
19 previously been barred from the Tesla campus. Moreover, he has not returned to
20 the Tesla facility since the February 21, 2019 event. (Hothi Decl. at ¶3).

21 Nor is it unlawful to video or photograph locations that can be seen from
22 areas open to the public and in which there is no reasonable right to privacy.
23 Randeep intended to enter the showroom for the legitimate purpose of asking
24

1 salespeople about the availability of certain Tesla models and other questions
2 relevant to his research. (*Id.* at ¶4).

3 Additional misrepresentations relating to the specific events are addressed
4 below.

5 **4. No Tesla Employees Suffered Unlawful Violence.**

6 Respondent did not engage in any unlawful violence. In fact, he engaged in
7 no unlawful behavior at all. "Unlawful violence" is defined within the statute as, "any
8 assault or battery, or stalking as prohibited in Section 646.9 of the Penal Code, but
9 shall not include lawful acts of self-defense or defense of others." (Cal. Code Civ.
10 Pro. §527.8(b)(7)). An assault is defined by the California Penal Code as an unlawful
11 attempt, coupled with a present ability, to commit a violent injury on the person of
12 another. (Cal. Pen. Code, § 240). A battery is any willful and unlawful use of force or
13 violence upon the person of another. (Cal. Pen. Code, § 242). Any person who
14 willfully, maliciously, and repeatedly follows or willfully and maliciously harasses
15 another person and who makes a credible threat with the intent to place that
16 person in reasonable fear for his or her safety, or the safety of his or her immediate
17 family is guilty of the crime of stalking. (Cal. Pen. Code, § 646.9).

18 Each of the forms of unlawful violence requires an element of intent. "Assault
19 is a specific intent crime; one could hardly 'attempt' or try to 'commit' an injury on
20 the person of another if he had no intent to cause any injury to such other person."
21 (People v. Fanning (1968) 265 Cal. App. 2d 729). Battery also requires intent. (People
22 v. Brucker (1983) 148 Cal.App.3d 230, 235.) ("[F]inding defendant guilty of battery,
23 necessarily found his actions were intentional and not accidental."). The stalking
24

1 statute includes intent in the definition by using the words "willfully" and
2 "maliciously." As detailed below, the facts alleged by Tesla do not come close to
3 establishing that Randeep intentionally engaged in any act of unlawful violence.
4 Indeed, there was neither any unlawful action nor any violence.
5

6 **4.1. February 22, 2019 Tesla Parking Lot**

7 In her sworn declaration, Tesla Staff Global Security Investigator Christine Leslie
8 stated under oath that, Randeep, "drove his car quickly and recklessly out of the
9 parking spot, striking Mr. James as he sped out of the parking lot." There is a
10 significant and obvious problem with the testimony of Ms. Leslie: she was not present
11 when the events in the parking lot occurred. Her testimony about them is complete
12 hearsay and should be weighed accordingly. The Tesla employee who was there,
13 Tyler James, gave an account to police that is wholly at odds with Ms. Leslie's
14 hearsay declaration. The facts recorded in the Police Report, and which Randeep
15 will confirm, clearly establish that even if Randeep's car did "nick" Mr. James, it was
16 not intentional. According to the initial dispatch notes:
17

18 The Reporting Party is with security – he was asking a
19 subject, who was not supposed to be on the campus, to
20 leave and, as the subject was doing so, they nicked the
21 Reporting Party with their vehicle, while he was on foot.
22 Unknown if the driver realized they hit the reporting party
23 unknown if they did it intentionally. Reporting party didn't
24 seem to think so, but wants a report for a hit and run.¹

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28 (Hothi Decl. at ¶10, **Exhibit A** at p.5).

¹ Counsel replaced multiple abbreviations for ease of reading, but otherwise transcribed verbatim from the Police Report.

1 According to the Police Report, when Tyler James first called to report the
2 incident to the Fremont Police, he did not think the alleged contact was intentional
3 and did not know if Randeep knew of the contact. (*Id.* at p.2, Notification ¶4).

4 Officer Matthew Kerner responded to the call and interviewed James. James
5 showed Officer Kerner video footage on this work cellphone, but Kerner was unable
6 to see much of the incident. (*Id.* at p.4, Statement #1 from Tyler James). In other
7 words, the footage did not confirm that Randeep's vehicle made intentional
8 contact. On February 27, 2019, when Officer Kerner turned the case over to Officer
9 DeStefano, he provided the following information to DeStefano: "[a]s James
10 approached the vehicle, Randeep drove away **at a slow rate of speed**. Randeep's
11 vehicle struck James' knee." (*Id.* at p.2, Narrative, ¶4, Emphasis added). The Officer
12 also reported that after reviewing the video, Officer Kerner "**advised that it did not**
13 **appear to be an intentional act;**" that "**James also did not believe the driver of the**
14 **vehicle intended to hit him with his vehicle;**" and "**James did not have any injuries.**"
15 (*Id.*, Emphasis added).

16 Contrary to Ms. Leslie's claim that Officer Kerner attempted to deliver a no
17 trespass notice to Randeep, Officer Kerner reported that his attempt to contact
18 Randeep was not to serve a no trespass notice, but "to identify Randeep, obtain
19 insurance information, and his statement." (*Id.* at p. ¶5). Contrary to Ms. Leslie's
20 allegation that Randeep was uncooperative, Officer Kerner documented that
21 Randeep returned Kerner's phone message and answered his questions over the
22 phone. In response to those questions, Randeep stated that he did not believe he
23 struck Mr. James. He also reported that he did not believe Mr. James was wearing a
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1 uniform identifying James as a security officer. (*Id.* at p.3, Randeep Hothi's
2 Statement).

3 Officer Kerner reviewed the case and video with "Sgt. Miskella, Lt. Tang, and
4 Fremont Police Department Traffic personnel and all agreed that it did not meet the
5 elements of a hit and run." (*Id.* at p.5, Disposition). Likely because of pressure from
6 Tesla and its vendetta against Randeep, the case was nonetheless presented to the
7 District Attorney's Office to determine if charges of hit and run were applicable. The
8 DA's office declined to prosecute. (*Id.*). The elements of felony hit and run are
9 leaving the scene of an accident where someone was injured without identifying
10 yourself. (California Vehicle Code §20001(a)). Knowledge that an accident has
11 happened and that an injury has been inflicted is an essential element of the crime
12 of leaving the scene of a personal injury accident. (*State v. Snell* (1964) 177 Neb.
13 396, 403). Thus, the District Attorney determined there was not sufficient evidence
14 that Randeep's car made contact with James, or that Randeep was not aware his
15 car made contact.
16

17 The evidence thus uniformly establishes a lack of intent to cause harm or
18 otherwise unlawfully harm Mr. James. Randeep, again, emphatically states that he
19 does not believe he hit anyone with his vehicle.
20

21 **4.2. April 16, 2019 Test Vehicle**
22

23 There is also no evidence of unlawful violence on the day Randeep observed
24 the Tesla employees during their testing of the vehicles' auto pilot. None of the
25 allegations come close to establishing facts suggestive of assault or battery. On
26 February 21, 2019, Randeep was visiting his parents in Fremont. (Hothi Decl. at ¶17).
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1 He then traveled from Fremont to a meeting in San Francisco. (*Id.*). While heading
2 towards San Francisco, he happened upon the Tesla test car identified in the
3 Petition. (*Id.*). This chance encounter gave Randeep an opportunity to observe
4 Tesla's testing in real time. (*Id.*). He continued towards his destination while observing
5 the test car. (*Id.* at ¶8). He took several photographs and videos. (*Id.*). After crossing
6 the Eastern Span of the bridge, the test car left the highway. (*Id.*). Randeep
7 decided to observe whether the test car had the capabilities to conduct more
8 complicated maneuvers on surface roads. (*Id.*). After a few minutes of observing
9 the vehicle once the car completed its exit, Randeep turned around and continued
10 the vehicle once the car completed its exit, Randeep turned around and continued
11 his journey into San Francisco. (*Id.*).
12

13 Randeep's actions do not amount to stalking. To constitute stalking, any
14 "following" must be willful, malicious, and repeated **and** it must be coupled with a
15 credible threat with the intent to place that person in reasonable fear. Tesla makes
16 no allegations of, nor is there any evidence of, any intent to cause harm. To the
17 contrary, Randeep is empathetic towards Tesla employees, whom he believes are
18 routinely mistreated by Tesla. Even if Randeep intended to swerve towards the Tesla
19 test vehicle to challenge the car's responsiveness to external hazards, which he
20 adamantly denies, such intent would not be sufficient to establish stalking. Petitioner
21 needs to establish with clear and convincing evidence that Randeep intended to
22 place the Tesla employees in reasonable fear. Nothing suggests he intended to
23 harm the occupants of the Tesla vehicle. Again, Randeep emphatically asserts that
24 he did not, and that he did not attempt to swerve toward, threaten, harass, or
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1 endanger the Tesla vehicle or its occupants. Randeep's driving was ordinary, and
2 unremarkable. (*Id.*).

3 **5. Respondent Made No Threat of Violence against Any Tesla Employee.**

4 A credible threat of violence is a knowing and willful statement or course of
5 conduct that would place a reasonable person in fear for his or her safety, or the
6 safety of his or her immediate family, and that serves no legitimate purpose. (CCP
7 §527.8(b)(2)). The intent requirement for a true threat is that the respondent
8 intentionally or knowingly communicates the threat; it is not necessary that the
9 respondent intends to, or is able to, carry out the threat. (*Huntingdon Life Sciences,*
10 *Inc. v Stop Huntingdon Animal Cruelty USA, Inc.* (2005) 129 CA4th 1228, 1255–1256,
11 29 CR3d 521). "Courts should be leery of finding that there has been a credible
12 threat of violence when the respondent has not directly conveyed the threatening
13 words." (California Judge's Benchguide 20, §20.23, citing, *Brown v Department of*
14 *Corrections* (2005) 132 CA4th 520, 524-525, 33 CR3d 754).
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17 Petitioner acknowledges that the employees seeking protection do not know
18 the respondent. (Petition at p.2). Randeep never made any statements, written or
19 oral, to any of the employees, much less communicated a threat.

20 The witness testimony and Police Report relating to the February 21, 2019
21 event on the Tesla parking lot clearly establish that Respondent reacted to being
22 approached by Tesla security by calmly and promptly removing himself from the
23 situation. That action of leaving is the opposite of threatening violence.

24
25 Nor did Respondent convey any threat to the Tesla employees in the Test car
26 on April 16, 2019. The employees make vague claims about Randeep's car swerving
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1 towards the Tesla test car, but those claims seem to emerge from the imagination
2 based on the later examination of Randeep's Twitter feed. It is true that others on
3 social media encouraged Randeep to endanger the Tesla test car. Randeep,
4 however, never endangered the car. Moreover, those comments were made two
5 days after the event, which Tesla opportunistically cited in order to construct a
6 defamatory narrative. (Hothi Decl. at ¶9). They are no reflection of what occurred
7 on the highway on April 16th, and no reflection of Randeep's character. One must
8 wonder why these comments were included in the Petition at all. Matt Cross claims
9 to have called the police, but no police report verifies that.

10
11 At the time of the event, the Tesla employees who claim to have been in fear
12 for their safety had multiple options to protect themselves had they actually felt
13 threatened, all of which they declined to take. According to his sworn declaration,
14 the alleged conduct that Mr. Cross described as erratic and dangerous occurred
15 prior to entering the Bay Bridge toll plaza. The Tesla employees in the car could have
16 called the police from their mobile telephones while the allegedly dangerous
17 activity was occurring. They could have pulled over to the side of the highway and
18 let Randeep continue driving. They could have selected a lane leading to a booth
19 with a toll collector and asked for help or guidance. Or, they could have pulled over
20 at the Toll Operations Building, where typically there are multiple California Highway
21 Patrol officers and patrol cars. The employees took no such action to protect
22 themselves, suggesting that they did not feel threatened.

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24 Had the employees been in fear for their safety, one would imagine they
25 would have collectively decided to take at least some measure to protect
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1 themselves. They claim to have later called the police, but even then, they did not
2 bother to wait for an officer to arrive and make a report.

3 **6. There Is No Suggestions That Great or Irreparable Harm Will Occur in the Future in**
4 **the Absence of a Restraining Order.**

5 To obtain a permanent injunction under section 527.8, subdivision (f), a
6 plaintiff must also establish great or irreparable harm would result to an employee
7 without issuance of the prohibitory injunction because of the reasonable probability
8 the wrongful acts will be repeated in the future. (Scripps Health, 72 Cal.App.4th at
9 331.) Nothing in the Petition suggests that there is any probability of violence or
10 threats of violence in the future.

12 **7. First Amendment Rights Are Implicated**

13 Following the test car and recording its activities alone, does not amount to
14 either harassment or a credible threat of violence. Moreover, the Court may not
15 issue a TRO or a restraining order after hearing that prohibits speech or other
16 activities that are constitutionally protected. CCP §527.8(c). Here, Randeep's right
17 to gather and distribute information implicates constitutional issues because there
18 are "First Amendment interests in newsgathering." *In re Shain*, 978 F.2d 850, 855 (4th
19 Cir.1992) (Wilkinson J., concurring). See also *Branzburg v. Hayes*, 408 U.S. 665, 681, 92
20 S.Ct. 2646, 33 L.Ed.2d 626 (1972) ("without some protection for seeking out the news,
21 freedom of the press could be eviscerated."). Randeep's actions, including entering
22 locations open to the public, photographing locations where there is no
23 expectation of privacy, refusing to engage with Tesla's private security force, and
24 following and filming a Tesla vehicle being tested on public highways, were all done
25 in the pursuit of obtaining important information to distribute to the public.

1 **8. Harm to Respondent.**

2 Tesla's malicious and false allegations that Randeep engaged in or
3 threatened violence against Tesla employees has caused him significant harm. In
4 fact, those statements are clearly defamatory. However, by bringing this action,
5 Tesla has craftily cloaked itself in the powerful protection of the litigation privilege,
6 thereby ensuring itself cart blanch to defame Randeep without fear of retribution.
7 Regardless of how the Court rules, Tesla will have once again achieved its goals. But
8 what will become of Randeep?

9 The negative impact on Randeep is far greater than in the typical restraining
10 order action. The simple act of filing of the Petition outed (or "doxed") Respondent.
11 Randeep is at the final stages of obtaining a PhD. Tesla itself or a number of Tesla
12 fanatics have e-mailed Randeep's deans, department chair, and other faculty at
13 his institution commanding that the university expel Randeep from his Ph.D.
14 program. (Hothi Decl. at ¶12, **Exhibit B**). The inflammatory accusations made by
15 Tesla in this high-profile proceeding are certain to have a profound effect on his
16 future, and threaten his ability to complete his Ph.D. studies, his employment
17 prospects as he enters the job market, and his reputation for the rest of his life.
18 Randeep is now engaged in clearing the record, and repairing his reputation, but
19 the final fallout is yet to be determined. He and members of his family have
20 received a number of racial attacks, death threats, and harassment from Tesla or
21 Tesla's fervent supporters. (*Id.* at ¶13).

22 The granting of a petition for a restraining order implies that the court found
23 that the petitioner met the required standard. (*Ensworth v. Mullvain* (1990) 224
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1 Cal.App.3d 1105, 1112 [274 Cal.Rptr. 447])(Court held, "that the granting of the
2 injunction itself necessarily implies that the trial court found that [the legal standard
3 was met]"). Thus, if the restraining order issues, it is implied that the Court found clear
4 and convincing evidence that Randeep engaged in unlawful violence against the
5 Tesla employees or made credible threats of violence against them. In other words,
6 Randeep will have been adjudicated to be a violent person. In addition to the harm
7 to his academic and professional careers, such a ruling would eternally affect his
8 personal relationships. In each new relationship, Randeep would have to decide
9 whether to disclose or to risk damage to trust that always accompanies withholding
10 truth.
11

12 Tesla stands ready to use the issuance of a restraining order against Randeep
13 as a tool to discredit and cause harm to Randeep and his family.
14

15 **9. Conclusion**

16 This action is not about protecting Tesla's workers. Randeep never caused
17 harm to or threatened to cause harm to any Tesla workers. Tesla brought the action
18 as a means to discredit Randeep because he is an outspoken critic. The Court
19 should deny the petition.
20

21
22 Respectfully Submitted,
23

24
25 Date: May 17, 2019
26



27
28

D. Gill Sperlein
THE LAW OFFICE OF D. GILL SPERLEIN
Attorneys for Respondent

D. GILL SPERLEIN, SBN 172887
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Attorneys for Respondent

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

I, Randeep Hothi, declare:

1. I am the Respondent in this action.

23 2. I am a citizen journalist whose research and data have revealed
24 discrepancies in claims Tesla and its CEO have made about the company's
25 manufacturing operations, its technological capabilities, its financial health, and its
26 treatment of employees and customers. My work has been cited by a number of
27
28 business and technology reporters and has been relied upon by financial analysts.

1 My research has informed public discussion about technology in Silicon Valley and
2 has won for me a wide public following. At the time of the events in question, I was
3 researching Tesla's extravagant claims about "Full Self-Driving" and a "robo taxi"
4 fleet.

5 3. Prior to February 21, 2019, I was never asked or instructed not to enter
6 any Tesla property. Since that date, I have not entered any Tesla property.

8 4. On February 21, 2019, I was sitting in my car in the Tesla parking lot, near
9 the showroom. I intended to enter the showroom to ask salespeople about the
10 availability of certain Tesla models and other questions relevant to my research.

11 5. Two men approached my car. If they were security officers, I did not
12 know or realize. Neither of the men disclosed to me their identities, their profession,
13 or their purpose. The car was not marked, and I do not believe they were wearing
14 what I would consider conventional security uniforms. To me they appeared to be
15 in street clothes.

18 6. One of the men aggressively knocked on my window. My car was
19 backed into the space. I slowly drove forward and left the facility. I do not believe I
20 struck either of the men. If I had, I would have stopped.

21 7. On April 16, 2019, I was visiting my parents in Fremont. I left Fremont to
22 travel to an appointment I had in San Francisco. As I was already driving, I noticed
23 that a Tesla vehicle had just entered the freeway to the right of me. The Tesla had a
24 camera attached to its trunk. I suspected that the car was recording the operation
25 of Tesla Autopilot, a technology which I believe is profoundly flawed and
26 dangerous to the public.

1 8. I continued towards San Francisco. I took some videos and some
2 photographs. After traversing the Eastern Span of the Bay Bridge, the car headed
3 towards the exit ramp to Treasure Island. Because I was early for my meeting in San
4 Francisco, I decided to observe whether the test car had the capabilities to
5 conduct more complicated maneuvers on surface roads. After a few minutes of
6 observing the vehicle once the car completed its exit, I turned around and
7 continued my journey into San Francisco. I never swerved towards the care or tried
8 to trigger its auto response systems.
9

10 9. In response to a tweet I posted two days after I observed the test car, a
11 small number of people on Twitter suggested that I try to engage with the car.
12

13 10. On May 7, 2019, I went to the Fremont Police Station and requested a
14 copy of the police report relating to the February 21, 2019 event. A true and
15 complete copy is attached hereto as **Exhibit A**.
16

17 11. After Tesla filed the Petition in this action, copies were circulated on the
18 Internet. Previously, my Twitter name was not totally linked to me. In other words, it
19 was still largely anonymous. The filing of the petition disclosed my identity, a
20 practice commonly referred to as doxing.
21

22 12. Tesla or a number of Tesla fanatics e-mailed my deans, department
23 chair, and other faculty at the University where I am a PhD candidate. In those e-
24 mails the senders commanded that the university expel me from my Ph.D. program.
25 One example is attached hereto as **Exhibit B**.
26

27 ///
28 ///

1 13. Members of my family and I have received a number of racist attacks,
2 death threats, and harassment from Tesla or Tesla's fervent supporters.

3
4
5 I declare under penalty of perjury under the laws of the State of California
6 that the forgoing is true and correct.

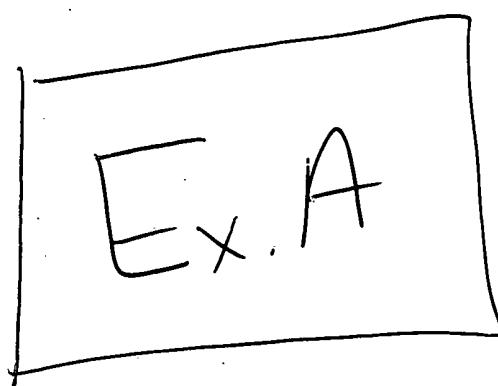
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10 Date: May 17, 2019

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Randeep Hofhi

Heinemann
d. gill spelein
heinemann@outlook.com



Declaration of Randeep Hothi

Exhibit A

Case No. RG1901577

**Incident Report
FREMONT POLICE DEPARTMENT**

190227026

Supplement No
ORIG



2000 Stevenson Blvd
Fremont, California 94538
Phone Number
(510) 790-6800
Fax Number
(510) 790-6831

Reported Date
02/27/2019
Rpt/Incident Typ
1061
Member#
DESTEFANO, JOSEPH RICHA

Administrative Information

Agency FREMONT POLICE DEPARTMENT	Report No 190227026	Supplement No ORIG	Reported Date 02/27/2019	Reported Time 15:07	CAD Call No 19024437
Status REPORT TO FOLLOW	Rpt/Incident Typ MISC PUBLIC SERVICE				
Location 45500 FREMONT BL	City Fremont				
ZIP Code 94538	Rep Dist 1175	Area 3	Beat 3 3	From Date 01/21/2019	From Time 14:43
Member# 14818/DESTEFANO, JOSEPH RICHARD	Assignment Swing Shift, A Team, Zone 1				
Entered By 14818	RMS Transfer Successful	Prop Trans Stat Successful	Approved By 2502	Approving Officer 2502	Approval Date 02/28/2019
Approval Time 18:59:04					
Body Worn Camera Yes					

Person Summary

Invl PER 1	Invl No I	Type HOTHI, RANDEEP	Name	MNI 1212029
Race O	Sex M	DOB 06/07/1986		
Invl PER 2	Invl No I	Type SINGH, KALVINDER	Name	MNI 20898684
Race Z	Sex M	DOB		

Vehicle Summary

Invl FCN 1	Type 8EJZ923	License No CA	State 2012	Lic Year ACUR	Year ATL	Make Style	Model WHI
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Summary Narrative

The purpose of this report is to document follow up investigation regarding a disturbance that occurred on 02/21/19 at Tesla.

EXHIBIT A - p. 1

Report Officer 14818/DESTEFANO, JOSEPH RICHARD	Printed At 05/07/2019 15:28
Page 1 of 3	

Incident Report
FREMONT POLICE DEPARTMENT

190227026

Supplement No
ORIG

PERSON 1: HOTHI, RANDEEP

Involvement PERSON	Inv No 1	Type Individual	Name HOTHI, RANDEEP								
MNI 1212029	Race Other	Sex Male	DOB 06/07/1986	Age 32	Juvenile? No	Height 6'00"	Weight 175#	Hair Color Black	Eye Color Brown	PRN 1948526	
Type Home	Address 45425 POTAWATAMI DR										
City Fremont		State California		ZIP Code 94539	Date 02/27/2019						
Type Operator License/ID			ID No D5254606		OLS California						
Phone Type Cell	Phone No (510) 449-9859		Date 02/27/2019								

PERSON 2: SINGH, KALVINDER

Involvement PERSON	Inv No 2	Type Individual	Name SINGH, KALVINDER								
MNI 20898684	Race Asian Indian	Sex Male	DOB	Age	Juvenile? No	Height 5'08"	Weight 170#	Hair Color Black	Eye Color Brown	PRN 1948527	
Type Address											
City		State		ZIP Code	Date						
Type	ID No				OLS						
Phone Type Cell	Phone No		Date								

Vehicle: 8EJZ923

Involvement Field Contact	Type Auto	License No 8EJZ923	State California	Year 2012	Make Acura	Model TL	Color White
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Narrative

Notification:

On 02/27/19, at about 1300 hours, I was contacted by Officer Kerner and he requested I follow up in regards to a call for service he had. Officer Kerner was going to be off work for an extended period of time.

Officer Kerner provided me the following details:

On 02/21/19, at about 1538 hours, Officer Kerner was dispatched to Tesla located at the 45000 block of Fremont Bl for a report of a disturbance. Officer Kerner spoke with Tesla Security Officer Tyler James who advised he was speaking with an individual who was not supposed to be on Tesla property. I later identified the individual as Randeep Hothi. Randeep was driving a white Acura TL bearing CA license plate 8EJZ923. He was parked in a parking stall. James approached Randeep to tell him to leave. As James approached the vehicle, Randeep drove away at a slow rate of speed. Randeep's vehicle struck James' knee.

Officer Kerner reviewed the video from Tesla security cameras and advised it did not appear to be an intentional act. James also did not believe the driver of the vehicle intended to hit him with his vehicle. James did not have any injuries. Officer Kerner advised James the action did not appear intentional and it occurred on private property. Officer Kerner provided James an incident history number. Tesla Security later forwarded James photos of Randeep and requested contact be made with Randeep.

Due to Officer Kerner being away from work, he requested I attempt to identify Randeep, obtain insurance information, and his statement.

Kalvinder Singh's Statement:

A records check of the white 2012 Acura TL shows the registered owner to be Kalvinder Singh. I drove to his listed

Report Officer 14818/DESTEFANO, JOSEPH RICHARD	Printed At 05/07/2019 15:28
Page 2 of 3	

Incident Report

FREMONT POLICE DEPARTMENT

190227026

Supplement No
ORIG

Narrative

address at · Potawatami Dr. I contacted Kalvinder and he told me the following in summary:

Kalvinder advised he is the registered owner of the vehicle, but his son Randeep Hothi drives the vehicle. I showed Kalvinder the picture provided from Tesla Security. Kalvinder advised that is his son Randeep. Kalvinder advised his son is a college student at the University of Michigan and he studies Philosophy. Kalvinder advised Randeep was not home, but provided me his cell phone number.

Kalvinder advised he has AAA insurance (Policy #CAAS100040903) which covers his Acura TL.

Randeep Hothi's Statement:

I called Randeep and I left him a voicemail asking him to return my phone call. Randeep returned my phone call and told me the following in summary:

I asked Randeep if we could meet in person and he stated he was not currently in Fremont.

I asked Randeep to tell me what happened when he was parked on Tesla's property. Randeep told me he was sleeping in his vehicle at Tesla when he was approached by someone who told him to leave. Randeep did not know who it was. I told Randeep it was Tesla Security. Randeep stated he did not know the individual was security and the individual was not clearly marked security vehicle.

Randeep said he immediately left the parking lot. Randeep was unaware that he hit anything. I advised Randeep the security officer claimed he was hit with Randeep's vehicle. Randeep was unaware and did not believe he hit anything. Randeep stated there was no damage to his vehicle and e did not intentionally hit the security guard with his vehicle.

Randeep was unable to specifically explain why he picked Tesla's parking lot to take a nap. Randeep stated it was just a random parking lot he found.

Body Camera:

My Watch Guard body camera was activated for the above listed statements and I later uploaded the recordings to Watch Guard.

Record Checks:

Randeep was clear any wants/probation. I conducted an RMS check and Randeep was previously listed as a victim in a battery and a driver in a traffic collision. I searched Randeep's criminal history. Randeep had no prior arrests.

Disposition:

I advised Officer Kerner of the above. He will follow up with Tesla Security.

The purpose of this report is for documentation purposes only.

EXHIBIT A - p. 3

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Incident Report

FREMONT POLICE DEPARTMENT

190227026

Supplement No
0001



2000 Stevenson Blvd
Fremont, California 94538
Phone Number
(510) 790-6800
Fax Number
(510) 790-6831

Reported Date
03/15/2019
Rpt/Incident Typ
1061
Member#
KERNER, MATTHEW JOHN

Administrative Information

Agency	Report No	Supplement No	Reported Date	Reported Time	CAD Call No
FREMONT POLICE DEPARTMENT	190227026	0001	03/15/2019	22:35	19024437
Status	Rpt/Incident Typ				
REPORT TO FOLLOW	MISC PUBLIC SERVICE				
Location					
45500 FREMONT BL					
ZIP Code	Rep Dist	Area	Beat	From Date	From Time
94538	1175	3	3 3	01/21/2019	14:43
From Date				To Date	
				01/21/2019	14:43
To Date					
Member#	Assignment				
14792/KERNER, MATTHEW JOHN	Swing Shift, A Team, Zone 1				
Entered By	Assignment				
14792	Swing Shift, A Team, Zone 1				
Prop Trans Stat	Approved By	Approving Officer	Approval Date		Approval Time
Successful	12039	12039	04/07/2019		22:16:10

Summary Narrative

The purpose of this supplemental report is to document my actions in taking Tyler James' statements. Court Liaison Sgt. Decker also presented this case to the District Attorney's Office. The DA's Office declined to prosecute any crimes regarding this matter.

See narrative for details.

No further action taken, case closed.

PERSON 1: JAMES, TYLER

Involvement	Inv No	Type	Name				
PERSON	1	Individual	JAMES, TYLER				
MNI	Race	Sex	DOB	Age	Juvenile?	RMS Transfer	PRN
31081864	White	Male			No	Successful	1953661
Tuna							
City	State		Date				
Phone Type	Phone No		Date				

Narrative

Notification

On 02/21/2019 I, Ofc. Kerner #14792, was dispatched to Tesla, located at 45500 Fremont Blvd, regarding a subject, later identified as Randeep Hothi, who was not supposed to be on the property. Dispatch advised the reporting party, Tyler James, called FPD to report that Hothi was on their property and he was not supposed to be there. James contacted Hothi and asked him to leave. When he did leave, Hothi nicked James with his vehicle. James told dispatch he did not know if Hothi realized he hit James, and did not know if he did it intentionally.

Statement #1 from Tyler James

I responded to the security office and spoke with James, who in essence, told me the following: James was working security at Tesla when Hothi came on the property and was not supposed to be there. James stated he went up to contact Hothi at his driver's side window as he was parked in a parking stall to verify that he was not an employee and not supposed to be on the property. As James was attempting to talk to Hothi at his driver's side

Report Officer 14792/KERNER, MATTHEW JOHN	Printed At 05/07/2019 15:28
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Incident Report

FREMONT POLICE DEPARTMENT

190227026

Supplement No
0001

Narrative

window, Hothi drove forward out of the parking stall that he was backed into and bumped into James' knee as he was leaving the parking stall. James did say he got bumped into by Hothi's vehicle on the way out of the parking stall because it was an angled stall and he did turn to exit the stall. I asked James if he was injured and he told me his knee was starting to "flare" up a little bit but as far as he knew, he had no visible injuries or bruising. James said other security officers attempted to drive up to Hothi to tell him to stop but he did not stop. James told me he did have video footage on his work phone I could look at; however, he was not able to show me the footage from their security cameras on site. I watched the video on James' work cellphone and I was unable to see much of the incident. I did see Hothi in the vehicle, but I was unable to see anything further to solidify James' statement.

I concluded my interview of James and gave him a business card with the incident history number on it.

Statement #2 from Tyler James

On 03/15/2019, I took another statement from James due to him saying he has further information. In essence, he told me the following: On 02/21/2019, at approximately 1411 hours, Tesla security got a hit on their license plate readers that there was a vehicle in the lot that was not supposed to be on the property. James responded to the area and saw Hothi driving his White Acura TL from the south lot of the factory into the factory lot on the property. Hothi backed his vehicle into a parking stall and parked there. James exited his unmarked Tesla security vehicle from two stalls away while wearing a marked Tesla security uniform. James approached Hothi while he was seated in his vehicle in the driver's seat. James walked up to the vehicle and tapped on the driver's side window and asked Hothi to roll down the window. James said Hothi made eye contact with him. As James asked him to roll down his window, Hothi began to move around like he was looking for something. After doing so, Hothi drove forward out of the parking stall. As Hothi drove forward out of the parking stall, the driver's side door of the vehicle struck James' left knee. James told me during this interview that the parking stalls are straight and not angled. James stated that he did not know if Hothi intentionally hit him as he did not know his mindset. James said security officers in marked Tesla security uniforms attempted to stop Hothi, but were not successful. James did not elaborate on what they did to try and stop him. After seeing a Doctor, James said the injuries to his knee was soft tissue damage. He stated he could see that his left knee was more swollen than the right knee. James also said there were no cuts, scrapes, or visible injuries.

Disposition:

I reviewed the case and video with Sgt. Miskella, Lt. Tang, and FPD Traffic personnel and all agreed that it did not meet the elements of a hit and run.

On 04/02/19, Court Liaison Sgt. Decker presented this case to the District Attorney's Office to determine if charges of hit and run were applicable. I provided Sgt. Decker with all reports, the CAD printout from the detail (including notes from the Dispatcher who took the call), and the video provided from Tesla Security.

It should be noted that the Dispatcher/Call-Taker noted the following as they spoke with the R/P:

"RP IS WITH SECURITY - HE WAS ASKING A SUBJ, WHO NOT SUPPOSED TO BE ON THE CAMPUS, TO LEAVE AND, AS THE SUBJ WAS DOING SO, THEY NICKED THE RP WITH THEIR VEHICLE, WHILE HE WAS ON FOOT. UNK IF THE DRIVER REALIZED THEY HIT THE RP AND UNK IF THEY DID IT INTENTIONALLY. RP DIDN'T SEEM TO THINK SO, BUT WANTS A RPT FOR A HIT AND RUN"

After reviewing these documents and video, the DA's Office declined to prosecute any crimes involving this incident.

No further action taken, case closed.

EXHIBIT A - p. 5

Report Officer 14792/KERNER, MATTHEW JOHN	Printed At 05/07/2019 15:28
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**Incident Report
FREMONT POLICE DEPARTMENT**

190227026

Supplement No
0002



2000 Stevenson Blvd
Fremont, California 94538
Phone Number
(510) 790-6800
Fax Number
(510) 790-6831

Reported Date
04/10/2019
Rpt/Incident Typ
1061
Member#
DESTEFANO, JOSEPH RICHA

Administrative Information

Agency	Report No	Supplement No	Reported Date	Reported Time	CAD Call No			
FREMONT POLICE DEPARTMENT	190227026	0002	04/10/2019	16:52	19024437			
Status	Rpt/Incident Typ							
REPORT TO FOLLOW	MISC PUBLIC SERVICE							
Location						City		
45500 FREMONT BL						Fremont		
ZIP Code	Rep Dist	Area	Beat	From Date	From Time	To Date	To Time	
94538	1175	3	3 3	01/21/2019	14:43	01/21/2019	14:43	
Member#						Assignment		
14818/DESTEFANO, JOSEPH RICHARD						Swing Shift, A Team, Zone 1		
Entered By	RMS Transfer	Prop Trans Stat	Approved By	Approving Officer		Approval Date		
14818	Successful	Successful	12636	12636		04/10/2019		
Approval Time								
22:36:48								

Summary Narrative

The purpose of this report is to document an attempt to issue Randeep Hothi a warning notice of trespass from all Tesla Properties.

Narrative

On 04/03/19, at about 1523 hours, I arrived at Randeep Hothi house on Potawatami Dr in an attempt to give Randeep a warning notice of trespass from all Tesla Properties. There was no answer at the front door. I called Randeep two times on his cell phone and he did not answer. I then called Randeep's father (Kalvinder Singh) who advised he was almost home. Kalvinder told me his son was not home and he did not know when he would return home. Kalvinder told me he would call me when his son got home.

At about 1649 hours, I called Kalvinder two more times and he did not answer any of my calls. At about 2249 hours, I called Kalvinder and spoke to him. Kalvinder told me his son was an adult and he was not home. I explained to Kalvinder I was just trying to give Randeep a document to close out this case. Kalvinder got upset with me and told me he was going to complain to the Chief of Police. I explained to Kalvinder I was just trying to close this case out and neither he or Randeep were in any trouble.

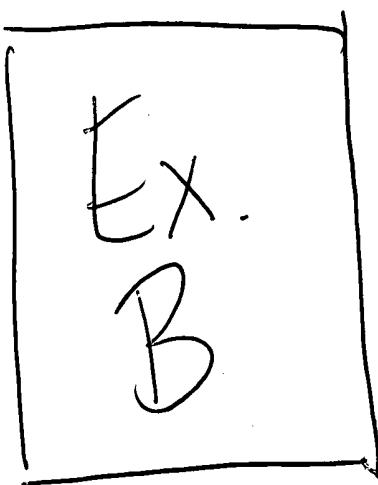
On 04/08/19, at about 2050 hours, I called Randeep and there was no answer. I left him another voicemail asking him to call me back.

On 04/09/19, at about 0046 hours, Randeep returned my phone call, but I did not answer. At about 1243 hours, I called Randeep back and he did not answer. At about 2031 hours, Randeep called me. I spoke to Randeep and he told me he moved out of the area and he did not want to meet with me. I explained to Randeep that I just wanted to issue him a trespass warning and he was not in any trouble. Randeep stated he did not want to sign it and he was in San Francisco. I asked Randeep if he would be willing to meet with me on 04/10/19 or 04/11/19. Randeep told me he was out of the area and he would have to think about it.

I was unable issue Randeep a warning notice of trespass.

EXHIBIT A - p. 6

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Declaration of Randeep Hothi

Exhibit B

Case No. RG1901577

From: Cameron Brotherston cameronbrotherston@gmail.com
Subject: Concerning Behaviour
Date: April 20, 2019 at 6:54 PM
To: um-alc@umich.edu
Cc: Randeep@umich.edu

CS

Hello,

I have been notified that one of your students has had a restraining order placed against him (attached). This is very concerning behaviour. When you take into account a tweet directed at Tesla CEO Elon Musk, that is also attributable to your student, I would be concerned about the mental stability of this student. Does the University of Michigan want to be associated to a person with such disturbing and violent tendencies.

The tweet reads as follows: "@elonmusk Tesla is a zero. Grifters get prison sentences for fraud. I own you. tick tock.

p.s. you have some capital to raise for your cash burning corporations. Get to work."

This is very disturbing behaviour unbecoming of any student of a respected learning institution.

Respectfully,

Kevin Wade

(specify):

and is filing this suit on behalf of the employee identified in item (2).

b. Lawyer for Petitioner (if any for this case).

Name: Zachary J. Alinder State Bar No.: 209009

Firm Name: Sideman & Bancroft LLP

Fill in court name and street address:

Superior Court of California, County of
Alameda
René C. Davidson Courthouse
1225 Fallon Street
Oakland, California 94612

Court fills in case number when form is filed.

Case Number:

RG 19015770

Petitioner's Address (If the petitioner has a lawyer, give the lawyer's information.)

c. Address: One Embarcadero Center, 22nd Floor

City: San Francisco State: CA Zip: 94111

Telephone: 415-392-1960 Fax: 415-392-0827

E-Mail Address: zalinder@sideman.com

(2) Employee in Need of Protection

Full Name: Matt Cross

Sex: M F Age: 30

(3) Respondent (Person From Whom Protection Is Sought)

Full Name: Randeep Hothi Age: 32

Address (if known): 45425 Potawatami Drive

City: Fremont State: CA Zip: 94539

(4) Additional Protected Persons

19:50 Sat Apr 20



Heidegger @loadiabe86 · 2018-07-11

[Tweet](#)



Here is proof that @skabooshka is controlled by Randeep and Gagan: ibb.co/iQOucT ----- @GroggyTBear @BarkMSmeagol @FitzsimmonsK @DWildemuth @handytsla @TeslaBull

26

58

205



Elon Musk @elonmusk · 1h

This is extremely messed up. @VW, what's going on?

95

56

335



skabooshka
@skabooshka

Replies to @elonmusk @loadiabe86 and 7 others

@elonmusk Tesla is a zero. Grifters get prison sentences for fraud. I own you. tick tock.

p.s. you have some capital to raise for your cash burning corporations. Get to work.

2019-04-20, 18:19

Tweet your reply

